UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION VI
1201 ELM STREET
DALLAS, TEXAS 75270

May 20, 1986

Greg Tipple
Remedial Investigations Unit Head
Superfund Section
Hazardous and Solid Waste Division
Texas Water Commission
P.O. Box 13087 Capital Station
Austin, Texas 78711

Re: South Cavalcade site

Dear Mr. Tipple:

I would like to respond to the two topics that you discussed in your April 28, 1986 letter to Bonnie DeVos. The first topic concerns clarification of the CERCLA Off-Site Disposal Policy and the second topic concerns off-site disposal of remedial investigation wastes from the South Cavalcade site.

EPA's interim policy for Implementing Off-Site Response Actions is set forth in the November 5, 1985 Federal Register. The off-site policy parallels the direction established by Congress in the RCRA amendments; EPA intends to pursue response actions that use treatment, reuse or recycling over land disposal. Land disposal will only be considered if the cost of the aforementioned alternatives far exceeds the cost of land disposal and does not provide substantially greater public health and environmental benefits. If land disposal is chosen, a land disposal facility that is in full compliance with RCRA, as defined in the policy, must be used.

There are a few, case specific, exceptions to this rule. These exceptions are triggered by the clause "CERCLA hazardous substances which are not hazardous wastes under RCRA, may, in some circumstances, be disposed of in other legal units." The policy continues by defining two categories of "other legal units." The first category of "other legal units" covers those existing units of a RCRA disposal facility that do not meet the double liner requirement. Those existing units that are not double lined, may be used based on EPA's consideration of toxicity, persistence and mobility of the hazardous substances. The second category of "other legal units" refers to disposal of wastes more appropriately regulated by other environmental amendments (e.g., disposal of PCB's at a TSCA approved disposal facility). Yet another case specific exception to the "land disposal facility that is in full compliance with RCRA" rule was recently established. On April 15, 1986, EPA advanced a set of proposed criteria for discharging CERCLA Wastewater to a POTW. As is stated in the opening paragraph of the April 15, 1986 memorandum "The current off-site policy ... does not address the set of concerns and issues unique to POTWs ..." I have enclosed, for your information, a copy of that memorandum.

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In summary, EPA off-site policy will favor treatment, reuse or recycling of the wastes; if these alternatives are not feasible, an approved RCRA land disposal facility will be chosen. Only in unique circumstances will a non-double lined RCRA facility be considered.

The second topic concerns the off-site disposal of specific solid and liquid wastes generated during the field investigation of the South Cavalcade Superfund site. Relative to this topic, our understanding is that TWC is providing its review and comment (via your letter) and that the final approval is being deferred to EPA Superfund Enforcement.

Your letter was triggered by an April 10, 1986 letter from Mr. Bill Tobin (McBride-Ratcliff and Associates) to Mr. Dick Martin (Industrial Solid Waste, TWC). Mr. Tobin's letter to Mr. Martin is somewhat unclear relative to the purpose of the request. Mr. Tobin's ultimate interest is in releasing relatively small quantities of washwater into the Houston sanitary sewer for treatment by the Houston POTW.

The relevant facts concerning the washwater at the South Cavalcade site are: (1) the water is contaminated with creosote constituents, (2) at the sub part-per-million level and (3) this washwater will be released in lots of several thousand gallons to a multi-million gallon per day POTW. Based on these facts, and consideration of the proposed criteria set forth in the April 15, 1986 memorandum, EPA approves the release(s) of the washwater to the Houston POTW. EPA's approval is contingent upon the permission/comments of the Department of Public Works, City of Houston.

Based on the CERCLA Off-Site Disposal Policy, Mr. Tobin's request for classification of the solid waste is also somewhat misplaced. The solid wastes from the South Cavalcade site will be treated, reused, recycled or disposed of at a RCRA facility in full complince with RCRA regulations. Superfund Enforcement will make this determination; with TWC review/comments via David Sorrells' office.

I hope that this letter has clarified your general and specific questions. Should you have any other questions please call me.

Sincerely yours,

Robert E. Hannesschlager, P.E.
Chief, Superfund Enforcemert Branch

Enclosure

cc: David Sorrells, TWC

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Page 1 SPECTRIX CORP REPORT Work Order # 86-07-034
Received: 07/11/86 08/11/86 07:16:55

COPY

REPORT TO: Koppers Company, Inc.
409 Texas Blvd. Suite #1
Texarkana, TX 75501

ATTEN: Shannon Craig

CLIENT: KOPPERS SAMPLES: 1
COMPANY: Koppers Company, Inc.
FACILITY:

WORK ID: Water
TAKEN: Client
TRANS: Client
TYPE: Project 85-317
P.O. #: 14-5-50106
INVOICE: under separate cover

PREPARED BY: Spectrix Corporation
3911 Fondren
Suite 100
Houston, Texas 77063-5821
ATTEN: Sample Control
PHONE: (713) 266-6800

CERTIFIED BY

CONTACT: CRUZ

Please call the above number if you have any questions.
NOTE: ALL SAMPLES WILL BE RETAINED FOR 90 DAYS AND THEN DISCARDED. IF YOU WISH YOUR SAMPLES RETURNED TO YOUR FACILITY CALL SAMPLE CONTROL AT THE ABOVE NUMBER.

SAMPLE IDENTIFICATION

01 SCK-WW01-07

TEST CODES and NAMES used on this report

BOD Biochenical Oxygen Demand
TSS SU Total Suspended Solids

CHECKLIST

SECTION II - Sample Data Packets

Sample No: SCK-WW01-07

✓ Organic Analysis Data Sheets (OADS)

NA VOA
✓ SV
NA Pest.

✓ Tentatively Identified Compounds

NA VOA
✓ SV

✓ Raw Data

NA VOA chromatogram
NA VOA quantitation report (surrogates)
✓ SV chromatogram
✓ SV quantitation report (surrogates)
NA Pest. chromatogram and integrator print out

NA Inorganic Analysis Data Sheets (IADS)

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INST ID: 5100

SPECTRIX DC # ----- 8
SAMPLE NUMBER: SCK-WW01-07

ORGANICS ANALYSIS DATA SHEET - PAGE 2

LABORATORY NAME: SPECTRIX
LAB SAMPLE ID NO.: 860703401
SAMPLE MATRIX: WATER
DATA RELEASE AUTHORIZED BY Ray

CASE NO.: ----
QC REPORT NO.: --
CONTRACT NO.: --
DATE SAMPLE RECEIVED: 7/1/86

SEMIVOLATILES

CONCENTRATION: LOW
DATE EXTRACTED: 7/14/86
DATE ANALYZED: 08/07/86

DATAFILE: 5U07034C01
DILUTION FACTOR: 1:0

CAS #	COMPOUND	UG/L	
C315	PHENOL	10 J	002518
C325	BIS(2-CHLOROETHYL)ETHER	10 U	
C330	2-CHLOROPHENOL	10 U	
C335	1,3-DICHLOROBENZENE	10 U	
C340	1,4-DICHLOROBENZENE	10 U	
C345	BENZYL ALCOHOL	10 U	
C350	1,2-DICHLOROBENZENE	10 U	
C355	2-METHYLPHENOL	10 U	
C360	BIS(2-CHLOROISOPROPYL)ETHER	10 U	
C365	4-METHYLPHENOL	10 U	
C370	N-NITROSODIPROPYLAMINE	10 U	
C375	HEXACHLOROETHANE	10 U	
C410	NITROBENZENE	10 U	
C415	ISOPHORONE	10 U	
C420	2-NITROPHENOL	10 U	
C425	2,4-DIMETHYLPHENOL	10 U	
C430	BENZOIC ACID	50 U	
C435	BIS(2-CHLOROETHOXY)METHANE	10 U	
C440	2,4-DICHLOROPHENOL	10 U	
C445	1,2,4-TRICHLOROBENZENE	10 U	
C450	NAPHTHALENE	10 J	
C455	4-CHLOROANILINE	10 U	
C460	HEXACHLOROBUTADIENE	10 U	
C465	P-CHLORO-M-CRESOL	10 U	
C470	2-METHYLNAPHTHALENE	10 U	
C510	HEXACHLOROCYCLOPENTADIENE	10 U	
C515	2,4,6-TRICHLOROPHENOL	10 U	
C520	2,4,5-TRICHLOROPHENOL	50 U	
C525	2-CHLORONAPHTHALENE	10 U	
C530	2-NITROANILINE	50 U	
C535	DIMETHYL PHTHALATE	10 U	
C540	ACENAPHTHYLENE	10 U	
C545	3-NITROANILINE	50 U	
C550	ACENAPHTHENE	10 J	
C555	2,4-DINITROPHENOL	50 U	
C560	4-NITROPHENOL	50 U	
C565	DIBENZOFURAN	10 J	
C570	2,4-DINITROTOLUENE	10 U	
C575	2,6-DINITROTOLUENE	10 U	

SPECTRIX DC # ----- 8

SAMPLE NUMBER: SCK-WW01-07

SEMIVOLATILE ORGANICS ANALYSIS DATA SHEET, CONTINUED

DATAFILE: 5U07034C01

CAS #	COMPOUND	UG/L
C580	DIETHYL PHTHALATE	10 U
C585	4-CHLOROPHENYL PHENYL ETHER	10 U
C590	FLUORENE	10 J
C595	4-NITROANILINE	50 U
C610	4,6-DINITRO-2-METHYLPHENOL	50 U
C615	N-NITROSODIPHENYLAMINE	10 U
C625	4-BROMOPHENYL PHENYL ETHER	10 U
C630	HEXACHLOROBENZENE	10 U
C635	PENTACHLOROPHENOL	50 U
C640	PHENANTHRENE	11
C645	ANTHRACENE	10 U
C650	DI-N-BUTYL PHTHALATE	10 U
C655	FLUORANTHENE	10 J
C715	PYRENE	10 J
C720	BUTYL BENZYL PHTHALATE	10 U
C725	3,3'-DICHLOROBENZIDINE	20 U
C730	BENZO(A)ANTHRACENE	10 U
C735	BIS(2-ETHYLHEXYL)PHTHALATE	48
C740	CHRYSENE	10 U
C760	DI-N-OCTYL PHTHALATE	10 U
C765	BENZO(B)FLUORANTHENE	10 U
C770	BENZO(K)FLUORANTHENE	10 U
C775	BENZO(A)PYRENE	10 U
C780	INDENO(1,2,3-CD)PYRENE	10 U
C785	DIBENZO(A,H)ANTHRACENE	10 U
C790	BENZO(GHI)PERYLENE	10 U

U = UNDETECTED AT THE LISTED DETECTION LIMIT
J = COMPOUND IS PRESENT, BUT BELOW THE LISTED DETECTION LIMIT
B = COMPOUND ALSO FOUND IN BLANK

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SPECTRIX DC # -----14

SEMIVOLATILE WATER REPORT

SAMPLE ID. SCK-WW01-07

FILENAME 5U07034C01

CLIENT KOPPER'S

DATE INJECTED 08/07/86 11:20:00

CALIB STD DATE 08/05/86

INST ID. 5100

ANALYST RAJ

VERIFIED BY TD

CORR. FACTOR 1.00

SCAN#		SEMIVOLATILE COMPOUNDS	M/E	AMOUNT	RRT	ARE
507	CI30	1,4-DICHLOROBENZEND-D4 ** IS1 **	152	40 UG/L	1.000	471
733	CI40	NAPHTHALENE-D8 ** IS2 **	136	40 UG/L	1.000	1860
1037	CI50	ACENAPHTHENE-D10 ** IS3 **	164	40 UG/L	1.000	740
1285	CI60	PHENANTHRENE-D10 ** IS4 **	188	40 UG/L	1.000	1237
1740	CI70	CHRYSENE-D12 ** IS5 **	240	40 UG/L	1.000	584
1967	CI75	PERYLENE-D12 ** IS6 **	264	40 UG/L	1.000	398
281	CS50	2-FLUOROPHENOL ** SU1 **	112	30 %	0.554	314
482	CS45	PHENOL-D5 ** SU2 **	99	46 %	0.951	753
1174	CS55	2,4,6-TRIBROMOPHENOL ** SU5 **	330	46 %	1.132	440
613	CS20	NITROBENZENE-D5 ** SU3 **	82	35 %	0.836	352
932	CS25	2-FLUOROBIPHENYL ** SU4 **	172	44 %	0.899	1296
1571	CS30	TERPHENYL-D14 ** SU6 **	244	35 %	0.903	268
484	C315	PHENOL	94	4 UG/L	0.955	77
736	C450	NAPHTHALENE	128	4 UG/L	1.004	175
1[illegible]1	C550	ACENAPHTHENE	153	5 UG/L	1.004	124
1069	C565	DIBENZOFURAN	168	4 UG/L	1.031	129
1127	C590	FLUORENE	166	5 UG/L	1.087	123
1288	C640	PHENANTHRENE	178	11 UG/L	1.002	349
1491	C655	FLUORANTHENE	202	2 UG/L	1.160	51
1527	C715	PYRENE	202	2 UG/L	0.878	38
1784	C735	BIS(2-ETHYLHEXYL)PHTHALATE	149	48 UG/L	1.025	682

SPECTRIX CORP. REPORT Work Order # 86-07-034
Received: 07/11/86 Results by Sample

SAMPLE ID SCK-WW01-07 SAMPLE # 01 FRACTIONS: A
Date & Time Collected 07/11/86 Category

BOD	TSS_SU
27 mg/L	274 mg/L

CHECKLIST

SECTION III - Blanks

✓ OADS

NA VOA
✓ SV
NA Pest.

✓ Tentatively Identified Compounds

NA VOA
✓ SV

✓ Raw Data

NA VOA chromatogram
NA VOA quantitation report (surrogates)
✓ SV chromatogram
✓ SV quantitation report (surrogates)
NA Pest. chromatogram with integrator print out

002522

INST ID: 5100 SPECTRIX DC # ----- 8

SAM NUMBER: LLW BLK

ORGANICS ANALYSIS DATA SHEET - PAGE 2

LABORATORY NAME: SPECTRIX CASE NO.: ----

LAB SAMPLE ID NO.: 8607034BLK QC REPORT NO.: --

SAMPLE MATRIX: WATER CONTRACT NO.: --

DATA RELEASE AUTHORIZED BY: Kaj DATE SAMPLE RECEIVED: 7/11/86

SEMIVOLATILES

CONCENTRATION: LOW DATAFILE: 5B07034C01

DATE EXTRACTED: 7/14/86

DATE ANALYZED: 08/07/86 DILUTION FACTOR: 1.0

CAS #	COMPOUND	UG/L
C315	PHENOL	10 U
C325	BIS(2-CHLOROETHYL)ETHER	10 U
C330	2-CHLOROPHENOL	10 U
C335	1,3-DICHLOROBENZENE	10 U
C340	1,4-DICHLOROBENZENE	10 U
C345	BENZYL ALCOHOL	10 U
C350	1,2-DICHLOROBENZENE	10 U
C355	2-METHYLPHENOL	10 U
C360	BIS(2-CHLOROISOPROPYL)ETHER	10 U
C365	4-METHYLPHENOL	10 U
C370	N-NITROSODIPROPYLAMINE	10 U
C375	HEXACHLOROETHANE	10 U
C410	NITROBENZENE	10 U
C415	ISOPHORONE	10 U
C420	2-NITROPHENOL	10 U
C425	2,4-DIMETHYLPHENOL	10 U
C430	BENZOIC ACID	50 U
C435	BIS(2-CHLOROETHOXY)METHANE	10 U
C440	2,4-DICHLOROPHENOL	10 U
C445	1,2,4-TRICHLOROBENZENE	10 U
C450	NAPHTHALENE	10 U
C455	4-CHLOROANILINE	10 U
C460	HEXACHLOROBUTADIENE	10 U
C465	P-CHLORO-M-CRESOL	10 U
C470	2-METHYLNAPHTHALENE	10 U
C510	HEXACHLOROCYCLOPENTADIENE	10 U
C515	2,4,6-TRICHLOROPHENOL	10 U
C520	2,4,5-TRICHLOROPHENOL	50 U
C525	2-CHLORONAPHTHALENE	10 U
C530	2-NITROANILINE	50 U
C535	DIMETHYL PHTHALATE	10 U
C540	ACENAPHTHYLENE	10 U
C545	3-NITROANILINE	50 U
C550	ACENAPHTHENE	10 U
C555	2,4-DINITROPHENOL	50 U
C560	4-NITROPHENOL	50 U
C565	DIBENZOFURAN	10 U
C570	2,4-DINITROTOLUENE	10 U
C575	2,6-DINITROTOLUENE	10 U

002523

002523

SPECTRIX DC # ----- 8

SAMPLE NUMBER: LLW BLK

SEMIVOLATILE ORGANICS ANALYSIS DATA SHEET, CONTINUED

DATAFILE: 5B07034C01

CAS #	COMPOUND	UG/L
C580	DIETHYL PHTHALATE	10 U
C585	4-CHLOROPHENYL PHENYL ETHER	10 U
C590	FLUORENE	10 U
C595	4-NITROANILINE	50 U
C610	4,6-DINITRO-2-METHYLPHENOL	50 U
C615	N-NITROSODIPHENYLAMINE	10 U
C625	4-BROMOPHENYL PHENYL ETHER	10 U
C630	HEXACHLOROBENZENE	10 U
C635	PENTACHLOROPHENOL	50 U
C640	PHENANTHRENE	10 U
C645	ANTHRACENE	10 U
C650	DI-N-BUTYL PHTHALATE	10 U
C655	FLUORANTHENE	10 U
C715	PYRENE	10 U
C720	BUTYL BENZYL PHTHALATE	10 U
C725	3,3'-DICHLOROBENZIDINE	20 U
C730	BENZO(A)ANTHRACENE	10 U
C735	BIS(2-ETHYLHEXYL)PHTHALATE	10 U
C740	CHRYSENE	10 U
C760	DI-N-OCTYL PHTHALATE	10 U
C765	BENZO(B)FLUORANTHENE	10 U
C770	BENZO(K)FLUORANTHENE	10 U
C775	BENZO(A)PYRENE	10 U
C780	INDENO(1,2,3-CD)PYRENE	10 U
C785	DIBENZO(A,H)ANTHRACENE	10 U
C790	BENZO(GHI)PERYLENE	10 U

U = UNDETECTED AT THE LISTED DETECTION LIMIT
J = COMPOUND IS PRESENT, BUT BELOW THE LISTED DETECTION LIMIT
B = COMPOUND ALSO FOUND IN BLANK

002524

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SPECTRIX DC # -----14

SEMIVOLATILE WATER REPORT

SAMPLE ID. LLW BLK (07034)

FILENAME 5B07034C01

CLIENT KOPPER'S

INST ID. 5100

DATE INJECTED 08/07/86 10:33:00

ANALYST RAJ

CALIB STD DATE 7/19/86

VERIFIED BY TR

CORR. FACTOR 1.00

SCAN#		SEMIVOLATILE COMPOUNDS	M/E	AMOUNT	RRT	ARE
504	CI30	1,4-DICHLOROBENZEND-D4 ** IS1 **	152	40 UG/L	1.000	436
733	CI40	NAPHTHALENE-D8 ** IS2 **	136	40 UG/L	1.000	1711
1038	CI50	ACENAPHTHENE-D10 ** IS3 **	164	40 UG/L	1.000	70E
1286	CI60	PHENANTHRENE-D10 ** IS4 **	188	40 UG/L	1.000	1429
1741	CI70	CHRYSENE-D12 ** IS5 **	240	40 UG/L	1.000	937
1969	CI75	PERYLENE-D12 ** IS6 **	264	40 UG/L	1.000	615
279	CS50	2-FLUOROPHENOL ** SU1 **	112	21 %	0.554	18C
472	CS45	PHENOL-D5 ** SU2 **	99	26 %	0.937	39C
1174	CS55	2,4,6-TRIBROMOPHENOL ** SU5 **	330	14 %	1.131	4C
612	CS20	NITROBENZENE-D5 ** SU3 **	82	35 %	0.835	32E
932	CS25	2-FLUOROBIPHENYL ** SU4 **	172	44 %	0.898	1063
1571	CS30	TERPHENYL-D14 ** SU6 **	244	67 %	0.902	817